

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

608 DJI Drones valued at \$137,569.73,

Defendant *in rem*.

NO. 3:25-MC-34

**UNOPPOSED MOTION TO EXTEND
TIME TO FILE JUDICIAL FORFEITURE ACTION**

The United States of America—with consent from Claimant Skyhigh Tech LLC through its attorney James Amyx—authorized by 18 U.S.C. § 983(a)(3)(A), moves the Court to extend the time in which the United States is required to file a complaint for civil judicial forfeiture from June 12, 2025, to July 12, 2025, regarding property to which a claim has been filed by the claimant in an administrative forfeiture proceeding with the United States Customs and Border Protection (“CBP”), and in support states:

1. The seized property in the custody of the CBP is described as 608 DJI Drones valued at \$137,569.73 (“the property”).
2. On December 19, 2024, CBP agents seized the property from Skyhigh Tech LLC at the Dallas, Texas port of entry.
3. The CBP has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to interested parties.
4. Skyhigh Tech LLC filed an administrative claim on March 14, 2025.

5. According to 18 U.S.C. § 983(a)(3), the United States is to file a judicial forfeiture action no later than 90 days after an administrative claim has been filed or return the seized property pending such filing, except that a court may extend the filing period for good cause shown or upon agreement of the parties.

6. Pursuant to 19 U.S.C. §§ 1603–04, the seizing agency transmitted the claim to the United States Attorney’s Office to pursue a judicial forfeiture action against the property.

7. Unless the Court extends the judicial filing deadline for good cause or upon agreement of the parties, the 90-day period that began with the claim filed by Skyhigh Tech LLC expires on June 12, 2025.

8. The parties have agreed to extend the time for filing a judicial action to and including July 12, 2025. The United States requests an order of court to extend the time for filing a judicial action to and including July 12, 2025, to allow additional time for the parties to explore an agreed early resolution of this matter.

Conclusion

Therefore, the United States requests an order to extend the filing period for a judicial forfeiture action as to the seized property, 608 DJI Drones valued at \$137,569.73, to and including July 12, 2025.

Respectfully submitted,

NANCY E. LARSON
ACTING UNITED STATES ATTORNEY

/s/ John Penn

JOHN PENN

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CERTIFICATE OF CONFERENCE

This is to certify that I have conferred with counsel for Claimant 608 DJI Drones valued at \$137,569.73, James Amyx, and understand he is not opposed to the relief sought by this motion.

/s/ John Penn

John Penn

Assistant United States Attorney